

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ARENDI S.A.R.L.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 12-1595-LPS
)	
LG ELECTRONICS, INC.,)	
LG ELECTRONICS USA, INC. and)	
LG ELECTRONICS MOBILECOMM U.S.A.,)	
INC.,)	
)	
Defendants.)	
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ARENDI S.A.R.L.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 12-1596-LPS
)	
APPLE INC.,)	
)	
Defendant.)	
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ARENDI S.A.R.L.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 12-1597-LPS
)	
BLACKBERRY LIMITED and)	
BLACKBERRY CORPORATION,)	
)	
Defendants.)	
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ARENDI S.A.R.L.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 12-1599-LPS
)	
MICROSOFT MOBILE INC.,)	
)	
Defendant.)	
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ARENDI S.A.R.L.,)

Plaintiff,)

v.)

C.A. No. 12-1601-LPS

MOTOROLA MOBILITY LLC)

f/k/a MOTOROLA MOBILITY, INC.,)

Defendant.)

ARENDI S.A.R.L.,)

Plaintiff,)

v.)

C.A. No. 12-1602-LPS

SONY MOBILE COMMUNICATIONS (USA))

INC. f/k/a SONY ERICSSON MOBILE)

COMMUNICATIONS (USA) INC.,)

SONY CORPORATION and)

SONY CORPORATION OF AMERICA,)

Defendants.)

ARENDI S.A.R.L.,)

Plaintiff,)

v.)

C.A. No. 13-919-LPS

GOOGLE LLC,)

Defendant.)

ARENDI S.A.R.L.,)

Plaintiff,)

v.)

C.A. No. 13-920-LPS

OATH HOLDINGS INC., and)

OATH INC.,)

Defendants.)

**JOINT STIPULATION AND [PROPOSED] ORDER FOR
EXTENSION OF CERTAIN DEADLINES**

WHEREAS, on October 23, 2018, the Court entered the Joint Scheduling Order (D.I. 93 in 1:12-1596-LPS);

WHEREAS, on January 16, 2020, the Court granted a Stipulation to Extend Certain Discovery Deadlines (D.I. 226 in 1:12-1596-LPS); and

WHEREAS, the parties have agreed to extend certain deadlines pursuant to Plaintiff's request for the reasons set forth in the declaration attached hereto as Exhibit A.¹

IT IS HEREBY STIPULATED AND AGREED by and through the undersigned counsel for Plaintiff and Defendants, subject to the approval of the Court, that:

1. The deadlines in the Amended Scheduling Order shall be modified as set forth below:

Event	Deadline
Initial Expert Reports	April 24, 2020
Rebuttal Expert Reports	July 9, 2020
Reply Expert Reports	August 27, 2020
Expert Discovery Cut Off	October 9, 2020
Case Dispositive-Motions Opening Brief	November 19, 2020
Case Dispositive-Motions Answering Brief	December 17, 2020
Case Dispositive-Motions Reply Brief	January 15, 2021

¹ Apple objects to the filing of Exhibit A under seal as it does not contain any confidential or highly confidential information. Apple reserves all rights as to the improper filing under seal of Exhibit A.

2. Each Defendant agrees to allow any new expert engaged by Arendi and properly cleared and authorized to review information pursuant to Paragraph 8 of the Protective Order to review printouts of source code already in Arendi's possession, to study notes of the source code taken by Arendi's reviewing experts, and to speak with Arendi's reviewing experts about the code.

3. Each Defendant, except for LG and Sony, further agrees to allow any new expert engaged by Arendi and properly cleared and authorized to review information pursuant to Paragraph 8 of the Protective Order to spend one, eight-hour-maximum day with the source code produced to date. In connection with this additional day of source code review, Arendi agrees that (1) Arendi will not request new source code printouts; (2) Arendi will not make new or follow-up requests for production of source code, or initiate discovery requests or disputes as a result of the additional day of source code review; and (3) Arendi will not advance new infringement theories (i.e., theories beyond what are set forth in the infringement contentions), based on the day of additional source code review. Arendi will compensate each Defendant to this agreement for any and all expenses and costs incurred by the Defendant in connection with preparing for and accommodating the additional day of source code review.

4. For any new expert engaged by Arendi, all time periods specified in Paragraph 8 of the Protective Order shall be modified to 5 business days.

The undersigned counsel hereby certify that they provided a copy of this stipulation to their clients in compliance with District of Delaware Local Rule 16.4(b).

Dated: February 18, 2020

/s/ Eve H. Ormerod

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